

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

	:	<b>Chapter 13</b>
<b>Lisa M. Balthaser</b>	:	
	:	
<b>Debtor</b>	:	<b>Bankruptcy No. 19-16164-MDC</b>
	:	
<b>-v-</b>	:	<b>Motion to Avoid Judicial Lien</b>
	:	<b>on Residential Real Estate and</b>
<b>Calvary SPV I, LLC as assignee of</b>	:	<b>Reclassify Claim #1 as Unsecured</b>
<b>Citibank, N.A.</b>	:	
	:	
<b>Respondent</b>	:	

**CERTIFICATION OF NO RESPONSE TO  
MOTION TO AVOID JUDICIAL LIEN ON REAL ESTATE**

I, Jeffery A. Fournier, Esquire, attorney for Debtor, hereby certifies the following:

1. That a Motion to Avoid Judicial Lien on Real Estate as filed on March 4, 2020.
2. Notice was served upon all creditors and interested parties on or about March 4, 2020;
3. More than twenty (20) days have lapsed and there is no response by creditors or interested parties.

WHEREFORE, I respectfully request that the Motion to Avoid Judicial Lien on Real Estate be approved.

/s/ Jeffery A. Fournier, Esquire

Jeffery A. Fournier, Esquire  
Attorney for Debtor